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IN THE UNITED STATES DISTRCIT COURT EASTERN DISRICT OF MISSOURI EASTERN DIVISION

BRYAN TRAVIS ROBISON,)
Plaintiff,)
VS.) Case No.: 4:18-CV-01527-CDP
DEPARTMENT OF INSURANCE,)
FINANCIAL INSTITUTIONS AND	
PROFESSIONAL REGISTRATION, ET AL.,)
)
Defendants.)

PLAINTIFF'S FIRST MOTION FOR SANCTIONS AGAINST DEFENDANT DIFP PURSUANT TO RULES 37(c)(1) AND 56(h)

For reasons set forth in the accompanying Memorandum of Law, which is incorporated by reference, Plaintiff **BRYAN T. ROBISON** moves this Court for an Order sanctioning Defendant DIFP for failing to produce a document pursuant to this Court's December 26, 2018, scheduling order and Plaintiff's July 30, 2019, discovery request, in addition to Defendant's discovery obligations under Rule 26(e). In support of this Motion, the following documents are filed concurrently with this Motion:

- 1. Memorandum in Support and its attached exhibits; and
- 2. Declaration of Chelsea K. Merta in Support of Motion for Sanctions.

Dated: November 25, 2019

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Respectfully submitted,

/s/ Chelsea K. Merta

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via the U.S. District Court's ECF System this 25th day of November, 2019, upon the following attorneys of record:

Richard Groeneman

Missouri Attorney General's Office 815 Olive Street, Suite 200 St. Louis, Missouri 63101 Richard.Groeneman@ago.mo.gov

Attorney for Defendants

/s/ Chelsea K. Merta
Attorney for Plaintiff